

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

H.B.,)	CIVIL ACTION FILE
)	
Plaintiff,)	NO. 1:22-cv-01181-JPB
)	
v.)	
)	
RED ROOF INNS, INC., <i>et al.</i> ,)	
)	
Defendants.)	

MOTION IN LIMINE TO EXCLUDE POST-JANUARY 2012 EVIDENCE

Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC (RRI Defendants) move this Court for an Order in limine excluding at trial any evidence of incidents and conduct that occurred after Plaintiff's alleged trafficking at RRI Norcross between December 26, 2011 and January 19, 2012. Evidence that post-dates January 19, 2012 is not relevant to Plaintiff's claims and poses a significant danger of unfairly prejudicing RRI Defendants, confusing and misleading the jury, and causing undue delay. This Court should exclude this evidence at trial.

A Memorandum in Support is filed contemporaneously and incorporated fully.

Dated: October 21, 2024

Respectfully submitted,

/s/ Marcella C. Ducca

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LOCAL RULE 7.1(D) CERTIFICATION

Counsel certifies that this brief has been prepared with Times New Roman size 14 pt font, which is one of the font and point selections approved by the Court in Local Rule 5.1. This brief does not contain more than 10 characters per inch of type.

Dated: October 21, 2024

/s/ Marcella C. Ducca

Marcella C. Ducca

*One of the Attorneys for Defendants
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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2024, a copy of the foregoing was filed electronically. Service of this filing will be made under Fed. R. Civ. P. 5(b)(2)(E) through this Court's electronic filing system. Parties may access the filing through the Court's system.

/s/ Marcella C. Ducca

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